## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN GREEN BAY DIVISION

CENTRAL BROWN COUNTY WATER AUTHORITY,	)	
Plaintiff, vs.	)	Case No. 1:09-CV-00131-WCG
CONSOER, TOWNSEND, ENVIRODYNE, now merged into AECOM USA, INC.	)	
Defendant.	)	
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## **DECLARATION I OF PAUL DAMON**

- I, Paul Damon, declares under penalty of perjury as follows:
- 1. I am an adult resident of the State of Massachusetts and make this Declaration on the basis of my own personal knowledge, my professional experience and my investigation of the costs and expenses described in my Supplemental Expert Report.
- 2. I am one of the expert witnesses retained by Central Brown County Water Authority ("CBCWA") in the above case.
- 3. I prepared a report of my expert opinions and conclusions as of November 16, 2009, a true and correct copy of which is attached hereto as **Exhibit A**.
- 4. By supplemental report dated May 17, 2012 attached hereto as **Exhibit B**, I was able to reduce the total amount of costs and expenses by working with Neill Hampton to sequence the work, to combine the work to achieve savings and to determine costs based on present day costs and construction methods as compared to November of 2009. The supplemental report contains my opinion to a reasonable certainty of the costs and expenses necessary to replace gaskets and install supports for the butterfly valves and the cost and

expenses necessary to conduct a combination deflection test and video test of the pipeline once it has been opened up for repairs and replacement.

Dated at Cambridge, Massachusetts this <u>25</u><sup>71</sup> day of July, 2012.

Paul Damon

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